

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
AT NASHVILLE**

<b>TERRY LYNN KING,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b><u>CAPITAL CASE</u></b>
	)	
<b>v.</b>	)	<b>Case No. 3:18-cv-01234</b>
	)	
<b>FRANK STRADA, et al.,</b>	)	<b>JUDGE CAMPBELL</b>
	)	
<b>Defendants.</b>	)	

---

<b>DONALD MIDDLEBROOKS,</b>	)	
	)	
<b>Plaintiff,</b>	)	<b><u>CAPITAL CASE</u></b>
	)	
<b>v.</b>	)	<b>Case No. 3:19-cv-01139</b>
	)	
<b>FRANK STRADA, et al.,</b>	)	<b>JUDGE CAMPBELL</b>
	)	
<b>Defendants.</b>	)	

---

**DEFENDANTS' NOTICE OF STATUS UPDATE**

---

Pursuant to this Court's orders (*King*, D.E. 227; *Middlebrooks*, D.E. 78), Defendants hereby provide notice to the Court regarding the status of corrective actions to comply with the recommendations in the Report and Findings of the Tennessee Lethal Injection Protocol Investigation ("Report") and Governor Lee's directives. (*King*, D.E. 229-1, 229-2; *Middlebrooks*, D.E. 81-1, 81-2.)

The Tennessee Department of Correction (TDOC) is currently working with counsel on draft revisions to Tennessee's execution procedures for lethal injection. The process of revising the protocol is a priority, is active, and ongoing. The Commissioner of TDOC is currently not prepared to provide a date when a new lethal injection protocol will be finalized.

Respectfully submitted,

JONATHAN SKRMETTI  
Attorney General and Reporter

/s/ Cody N. Brandon  
CODY N. BRANDON (037504)  
Managing Attorney  
Assistant Attorney General

SCOTT C. SUTHERLAND (29013)  
Deputy Attorney General

MIRANDA JONES (36070)  
Senior Assistant Attorney General

JOHN R. GLOVER (037772)  
Assistant Attorney General

Law Enforcement and  
Special Prosecutions Division  
P.O. Box 20207  
Nashville, Tennessee 37202-0207  
Off. (615) 532-7400  
Fax (615) 532-4892  
[Scott.Sutherland@ag.tn.gov](mailto:Scott.Sutherland@ag.tn.gov)  
[Cody.Brandon@ag.tn.gov](mailto:Cody.Brandon@ag.tn.gov)  
[Miranda.Jones@ag.tn.gov](mailto:Miranda.Jones@ag.tn.gov)  
[John.Glover@ag.tn.gov](mailto:John.Glover@ag.tn.gov)  
*Counsel for Defendants*

## CERTIFICATE OF SERVICE

I certify that on the 29th day of April, 2024, a copy of the foregoing was filed and served via the Court's CM/ECF system on the following counsel for *Middlebrooks*:

Amy Harwell  
Houston Goddard  
Katherine Dix  
Katheryn Thomas  
Kelley Henry  
Marshall Jensen  
Richard Tennent  
Federal Public Defender's Office (MDTN)  
810 Broadway, Suite 200,

Nashville, TN 37203  
615-695-6906  
[Amy\\_Harwell@fd.org](mailto:Amy_Harwell@fd.org)  
[houston\\_goddard@fd.org](mailto:houston_goddard@fd.org)  
[Katherine\\_Dix@fd.org](mailto:Katherine_Dix@fd.org)  
[kit\\_thomas@fd.org](mailto:kit_thomas@fd.org)  
[Kelley\\_Henry@fd.org](mailto:Kelley_Henry@fd.org)  
[Marshall\\_Jensen@fd.org](mailto:Marshall_Jensen@fd.org)  
[Richard\\_Tennent@fd.org](mailto:Richard_Tennent@fd.org)

And on the following counsel for *King*:

Alex Kursman  
Lynne Leonard  
Anastassia Baldrige  
Hayden Nelson-Major  
Assistant Federal Defenders  
Federal Community Defender for the E.D.  
Penn.  
Suite 545 West, The Curtis  
601 Walnut St.  
Philadelphia, PA 19106  
(215) 928-0520  
[alex\\_kursman@fd.org](mailto:alex_kursman@fd.org)  
[lynne\\_leonard@fd.org](mailto:lynne_leonard@fd.org)  
[ana\\_baldrige@fd.org](mailto:ana_baldrige@fd.org)  
[hayden\\_nelson-major@fd.org](mailto:hayden_nelson-major@fd.org)

David Esquivel  
Sarah Miller  
Jeremy Gunn  
Michael Tackeff

Bass, Berry & Sims 150 Third Ave. South  
Nashville, TN 37201  
(615) 742-6200  
[desquivel@bassberry.com](mailto:desquivel@bassberry.com)  
[smiller@bassberry.com](mailto:smiller@bassberry.com)  
[jeremy.gunn@bassberry.com](mailto:jeremy.gunn@bassberry.com)  
[michael.tackeff@bassberry.com](mailto:michael.tackeff@bassberry.com)

Alice Haston  
Amy Rao Mohan  
Christopher C. Sabis  
Sherrard Roe Voight & Harbison, PLC  
150 Third Ave. South  
Suite 1100  
Nashville, TN 37201  
(615) 742-4539  
[ahaston@srvhlaw.com](mailto:ahaston@srvhlaw.com)  
[amohan@srvhlaw.com](mailto:amohan@srvhlaw.com)  
[csabis@srvhlaw.com](mailto:csabis@srvhlaw.com)

/s/ Cody N. Brandon  
CODY N. BRANDON (037504)  
Managing Attorney